

Jeffrey N. Pomerantz (CA Bar No. 143717)
Maxim B. Litvak (CA Bar No. 215852)
PACHULSKI STANG ZIEHL & JONES LLP
10100 Santa Monica Blvd., 13th Floor
Los Angeles, CA 90067-4114
Telephone: 310/277-6910
Facsimile: 310/201-0760
Email: jpomerantz@pszjlaw.com
mlitvak@pszjlaw.com

Attorneys for the Official Committee of
Unsecured Creditors

**UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
NORTHERN DIVISION**

In re:

HVI CAT CANYON, INC.

Debtor.

Case No.: 19-bk-11573-MB

Chapter 11

**APPLICATION FOR APPROVAL OF THE
EMPLOYMENT OF DORE ROTHBERG
McKAY AS SPECIAL OIL & GAS COUNSEL
TO THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS, EFFECTIVE AS
OF NOVEMBER 14, 2019**

[No Hearing Required]

**TO THE HONORABLE MARTIN R. BARASH, UNITED STATES BANKRUPTCY JUDGE,
AND THE OFFICE OF THE UNITED STATES TRUSTEE:**

The Official Committee of Unsecured Creditors (the “Committee”) appointed in the above-captioned case (the “Chapter 11 Case”) of HVI Cat Canyon, Inc. (the “Debtor”) submits this application (the “Application”) for the entry of an Order authorizing the employment and retention of the Dore Rothberg McKay (“DRM”) as special oil and gas counsel to the Committee, effective as of November 14, 2019, pursuant to sections 328 and 1103 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2014 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Rule 2014-1 of the Local Bankruptcy Rules of the United States Bankruptcy Court for the Central District of California (the “Local Bankruptcy Rules”). In support of the Application, the Committee submits the Declaration of Carl Dore, Jr. (the “Dore Declaration”), filed concurrently herewith. In further support of the Application, the Committee respectfully represents as follows:

JURISDICTION AND VENUE

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b).

2. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

3. The statutory predicates for the relief sought herein are sections 328(a) and 1103(a) of the Bankruptcy Code, Bankruptcy Rules 2014 and 2016, and Local Bankruptcy Rules 2014-1 and 2016-1.

BACKGROUND

4. On July 25, 2019 (the “Petition Date”), the Debtor filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”) in the United States Bankruptcy Court for the Southern District of New York (the “SDNY Court”), thereby commencing this chapter 11 case, bearing case number 19-12417 (MEW) (the “Case”). On August 28, 2019, the SDNY Court entered an Order Transferring Venue to United States Bankruptcy Court for the Northern District of Texas [Docket No. 106] (the “NDTX Court”), bearing case number 19-32857-hdh11.

5. On August 9, 2019, the United States Trustee for the Southern District of New York appointed the Committee to represent the interests of all unsecured creditors in this case pursuant to section 1102 of the Bankruptcy Code. The members appointed to the Committee are: (i) Brian Corson, in his Individual Capacity; (ii) Escolle Tenants in Common; and (iii) Pacific Petroleum California, Inc. *See Appointment of Official Committee of Unsecured Creditors’ Committee* [Docket No. 34]. On August 15, 2019, the Committee held its initial meeting and, among other things, voted to retain Pachulski Stang Ziehl & Jones LLP (“PSZ&J” or the “Firm”) as its bankruptcy counsel.

6. On September 12, 2019, the NDTX Court entered an Order Granting Transfer of Venue, transferring the Case to the United States Bankruptcy Court, Central District of California (Northern Division) [Docket No. 184] (the “Bankruptcy Court”). On September 16, 2019, the Case was transferred to the Bankruptcy Court, and assigned case number 19-bk-11573-MB.

7. On October 16, 2019, the court entered its *Agreed Order Granting Motion for Appointment of a Chapter 11 Trustee* [Docket No. 409].

8. On October 21, 2019, Michael A. McConnell was appointed by the Office of the United States Trustee to serve as chapter 11 trustee. (the “Chapter 11 Trustee”) [Docket No. 418].

9. The Committee has selected DRM to serve as special oil and gas counsel in this case, effective as of November 14, 2019.

RETENTION OF DRM

10. By this Application, the Committee seeks authority to retain DRM as special oil and gas counsel to conduct a review of liens asserted by UBS AG against the Debtor’s oil and gas interests, pursuant to sections 328 and 1103 of the Bankruptcy Code, Bankruptcy Rule 2014(a) and Local Bankruptcy Rule 2014-1.

11. The Committee has selected DRM because of its extensive experience in representing oilfield services companies. DRM files more mineral liens than any other firm in the United States. Its clients range from the largest public companies in the industry to small, family-owned entities. Most have been DRM’s clients for years. DRM also has a section dedicated to reviewing Master Service Agreements to help in negotiations. In its niche, DRM is the market leader and experts in best practices. Accordingly, the Committee believes that DRM is well qualified to serve as its special oil and gas counsel in this Chapter 11 Case.

12. The Committee submits that it is necessary and appropriate for it to employ and retain DRM to provide, among other things, the following services:

- a) assist the Committee in its investigation of the liens asserted by UBS AG against the Debtor’s oil and gas interests;
- b) prepare, on behalf of the Committee, any pleadings, including without limitation, motions, memoranda, complaints, adversary complaints, objections or comments in connection with the foregoing; and
- c) perform such other legal services as may be required or requested or as may otherwise be deemed in the interests of the Committee in accordance with the Committee’s powers and duties as set forth in the Bankruptcy Code, Bankruptcy Rules or other applicable law.

13. The Committee understands and agrees that DRM will charge for its legal services on an hourly basis in accordance with its ordinary and customary hourly rates and for out-of-pocket expenses, as set forth in the Dore Declaration. The Committee requests that all legal fees and related costs and expenses incurred by the Committee on account of services rendered by DRM in this case

1 be paid as administrative expenses of the estate pursuant to sections 328, 330(a), 331, 503(b) and
2 507(a)(2) of the Bankruptcy Code. The Committee understands that DRM will be submitting
3 detailed statements to the Court setting forth the services rendered and seeking compensation and
4 reimbursement of expenses. The Committee also understands that DRM will be applying to the
5 Court for authority to be paid its fees and expenses pursuant to its obligations under the Bankruptcy
6 Code and any administrative fee orders entered in this case, and the Committee consents to same.

7 14. Based upon the Dore Declaration, the Committee is satisfied that DRM (i) does not
8 represent any other entity having an adverse interest to the Committee, the Chapter 11 Trustee, the
9 Debtor, its estate, or any other party-in-interest in connection with this case, (ii) has no connection
10 with the U.S. Trustee or any other person employed in the office of the U.S. Trustee, and (iii) DRM
11 has not been paid any retainer against which to bill fees and expenses. To the best of the
12 Committee's knowledge, DRM has no connection with creditors or any other party-in-interest except
13 as otherwise noted in the Dore Declaration.

14 15. The Committee requests approval of the employment of DRM as special oil and gas
15 counsel, effective as of November 14, 2019. The Committee's selection of DRM as its counsel
16 necessitated that DRM immediately commence work on time-sensitive matters and promptly devote
17 substantial resources to the Debtor's case, pending submission and approval of this Application.
18 Such relief is warranted pursuant to Local Bankruptcy Rule 2014-1(b) because this Application is
19 made within 30 days of the commencement of services by DRM.

20 **SUPPORTING AUTHORITY**

21 16. The Committee seeks to appoint DRM as its special oil and gas counsel in accordance
22 with sections 328(a) and 1103 of the Bankruptcy Code. Section 328(a) authorizes a committee
23 appointed under section 1102 of the Bankruptcy Code, with the court's approval, to employ "a
24 professional person under section 327 or 1103 of this title, as the case may be, on any reasonable
25 terms and conditions of employment, including on a retainer, on an hourly basis, on a fixed or
26 percentage fee basis, or on a contingent fee basis." 11 U.S.C. § 328(a). Section 1103, in turn,
27 requires that an attorney employed to represent a committee "may not, while employed by such
28

1 committee, represent any other entity having an adverse interest in connection with the case.” 11
2 U.S.C. § 1103.

3 17. The Committee submits that for all the reasons stated above and in the Dore
4 Declaration, the retention and employment of DRM as special California oil and gas counsel to the
5 Committee is warranted under sections 328(a) and 1103.

6 **WHEREFORE**, the Committee requests that an Order be entered authorizing it to retain
7 DRM as its special oil and gas counsel in this case, effective as of November 14, 2019, and granting
8 the Committee such other relief as the Court deems just and proper under the circumstances.

9
10 Dated: December 4, 2019

PACHULSKI STANG ZIEHL & JONES LLP

11 By /s/ Maxim B. Litvak
12 Attorneys for Official Committee of Unsecured
13 Creditors
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PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
10100 Santa Monica Boulevard, 13th Floor, Los Angeles, CA 90067

A true and correct copy of the foregoing document entitled (*specify*): **APPLICATION FOR APPROVAL OF THE EMPLOYMENT OF DORE ROTHBERG McKAY AS SPECIAL OIL & GAS COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS, EFFECTIVE AS OF NOVEMBER 14, 2019** will be served or was served (**a**) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (**b**) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) **December 4, 2019**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (*date*) **December 4, 2019**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) **December 4, 2019**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

VIA OVERNIGHT DELIVERY

Honorable Martin R. Barash
 U.S. Bankruptcy Court
 21041 Burbank Boulevard, Suite 342 / Courtroom 303
 Woodland Hills, CA 91367-6603

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

December 4, 2019
Date

Nancy H. Brown
Printed Name

/s/ Nancy H. Brown
Signature

SERVICE INFORMATION FOR CASE NO. 19-bk-11573-MB

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF)

- William C Beall will@beallandburkhardt.com, carissa@beallandburkhardt.com
- Alicia Clough aclough@loeb.com, mnielson@loeb.com, ladocket@loeb.com
- Marc S Cohen mscohen@loeb.com, klyles@loeb.com
- Alec S DiMario alec.dimario@mhllp.com, debra.blondheim@mhllp.com; Syreeta.shoals@mhllp.com
- Karl J Fingerhood karl.fingerhood@usdoj.gov, efile_ees.enrd@usdoj.gov
- H Alexander Fisch Alex.Fisch@doj.ca.gov
- Don Fisher dfisher@ptwww.com, tblack@ptwww.com
- Brian D Fittipaldi brian.fittipaldi@usdoj.gov
- Gisele M Goetz gmgoetz@hbsb.com, ggoetz@collegesoflaw.edu
- Karen L Grant kgrant@sil.com
- Ira S Greene Ira.Greene@lockelord.com
- Matthew C. Heyn Matthew.Heyn@doj.ca.gov, mcheyn@outlook.com
- Brian L Holman b.holman@musickpeeler.com
- Eric P Israel eisrael@DanningGill.com, danninggill@gmail.com; eisrael@ecf.inforuptcy.com
- Razmig Izakelian razmigizakelian@quinnemanuel.com
- Alan H Katz akatz@lockelord.com
- John C Keith john.keith@doj.ca.gov
- Jeannie Kim jkim@friedmanspring.com
- Maxim B Litvak mlitvak@pszjlaw.com
- Michael Authur McConnell (TR) Michael.mcconnell@kellyhart.com
- Brian M Metcalf bmetcalf@omm.com
- David L Osias dosias@allenmatkins.com, bcrfilings@allenmatkins.com, kdemorest@allenmatkins.com, csandoval@allenmatkins.com
- Darren L Patrick dpatrick@omm.com, darren-patrick-1373@ecf.pacerpro.com
- Jeffrey N Pomerantz jpomerantz@pszjlaw.com
- Todd C. Ringstad becky@ringstadlaw.com, arlene@ringstadlaw.com
- Mitchell E Rishe mitchell.rishe@doj.ca.gov
- Sonia Singh ssingh@DanningGill.com, danninggill@gmail.com, ssingh@ecf.inforuptcy.com
- Daniel A Solitro dsolitro@lockelord.com, ataylor2@lockelord.com
- Ross Spence ross@snowspencelaw.com, janisserrill@snowspencelaw.com; donnasutton@snowspencelaw.com; brittanyDecoteau@snowspencelaw.com
- Christopher D Sullivan csullivan@diamondmccarthy.com, mdomer@diamondmccarthy.com; kmartinez@diamondmccarthy.com
- Jennifer Taylor jtaylor@omm.com
- John N Tedford jtedford@DanningGill.com, danninggill@gmail.com; jtedford@ecf.inforuptcy.com
- Salina R Thomas bankruptcy@co.kern.ca.us
- Patricia B Tomasco pattytomasco@quinnemanuel.com, barbarahowell@quinnemanuel.com; cristinagreen@quinnemanuel.com
- Fred Whitaker lshertzer@cwlawyers.com
- William E. Winfield wwinfield@calattys.com, scuevas@calattys.com
- Richard Lee Wynne richard.wynne@hoganlovells.com, tracy.southwell@hoganlovells.com; cindy.mitchell@hoganlovells.com
- Emily Young pacerteam@gardencitygroup.com, rjacobs@ecf.epiqsystems.com; ECFInbox@epiqsystems.com
- Aaron E de Leest adeleest@DanningGill.com, danninggill@gmail.com; adeleest@ecf.inforuptcy.com

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2. SERVED BY EMAIL

NAME	EMAIL
AKIN GUMP STRAUS HAUER & FELD	SDDAVIS@AKINGUMP.COM
ALLEN MATKINS LECK GAMBLE	JMEEDER@ALLENMATKINS.COM
ALLEN MATKINS LECK GAMBLE MALLORY & NATSIS LLP	DOSIAS@ALLENMATKINS.COM;MMARINO@ALLENMATKINS.COM
ANDREW KURTH LLP	DZDUNKEWICZ@ANDREWSKURTH.COM
ATTORNEY GENERAL OF CALIFORNIA	MICHAEL.ZARRO@DOJ.CA.GOV
BRIAN CORSON, IN HIS INDIVIDUAL CAPACITY	BRIAN@HUBMAC.COM
CA ATTORNEY GENERAL'S OFFICE	PIU@DOJ.CA.GOV
CALIFORNIA DEPARTMENT OF CONSERVATION	SHARON.ARMSTRONG@CONSERVATION.CA.GOV
CALIFORNIA DEPT. OF FISH & WILDLIFE 5	ASKR5@WILDLIFE.CA.GOV
CALIFORNIA DIVISION OF OIL, GAS &	WEBMASTER@CONSERVATION.CA.GOV
CALIFORNIA EMPLOYMENT DEVELOPMENT DEPT	WOTCSUPPORT@EDD.CA.GOV
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD	CENTRALCOAST@WATERBOARDS.CA.GOV
CALIFORNIA STATE CONTROLLER	EOINQUIRY@SCO.CA.GOV
CALIFORNIA STATE LANDS COMMISSION	JOHN.KEITH@DOJ.CA.GOV
CALIFORNIA WATER RESOURCES CONTROL BOARD	INFO@WATERBOARDS.CA.GOV
COLE SCHOTZ P.C.	MWARNER@COLESCHOTZ.COM
COLORADO DEPT OF PUBLIC HEALTH AND ENVIRONMENT	CDPHE.INFORMATION@STATE.CO.US
CONWAY MACKENZIE, INC.	JYOUNG@CONWAYMACKENZIE.COM;DFERTIG@CONWAYMACKENZIE.COM
CUMMINS & WHITE, LLP	FWHITAKER@CWLAWYERS.COM; ABOLDUC@CWLAWYERS.COM
DIAMOND MCCARTHY LLP	ADIAMOND@DIAMONDMCCARTHY.COM
DIAMOND MCCARTHY LLP	SGIUGLIANO@DIAMONDMCCARTHY.COM
DIAMOND MCCARTHY LLP	ADIAMOND@DIAMONDMCCARTHY.COM
EPA REGION 9	R9.INFO@EPA.GOV
ESCOLLE TENANTS IN COMMON	VMARTINEZ@TWITCHELLANDRICE.COM
FRIEDMAN & SPRINGWATER LLP	EFRIEDMAN@FRIEDMANSRING.COM; JKIM@FRIEDMANSRING.COM
GANONG LAW	PHIL@GANONGLAW.COM; NANCY@GANONGLAW.COM
GIBSON, DUNN & CRUTCHER LLP	OADENDORFF@GIBSONDUNN.COM
GLR, LLC	VAB@GRERANGROUP.COM
HANNA AND MORTON LLP	erenwick@hanmor.com
HVI CAT CANYON, INC.	RSG@GREKA.COM
HVI CAT CANYON, INC.	AGD@GREKA.COM
HVI CAT CANYON, INC.	MEO@GREKA.COM
LARSEN O'BRIEN LLP	PRIGALI@LARSONOBRIENLAW.COM; SBLEDSE@LARSONOBRIENLAW.COM; HPARK@LARSONOBRIENLAW.COM; MVASQUEZ@LARSONOBRIENLAW.COM
LOEB & LOEB LLP	SROSENTHAL@LOEB.COM
LOEB & LOEB LLP	VRUBINSTEIN@LOEB.COM

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

NAME	EMAIL
MCDOWELL HETHERINGTON LLP	JARROD.MARTIN@MHLLP.COM
MUSICK, PEELER & GARRETT LLP	B.HOLMAN@MUSICKPEELER.COM
MUSICK, PEELER & GARRETT LLP	L.MCAVOY@MUSICKPEELER.COM
NEW YORK STATE DEPT OF ENVIRONMENTAL CONSERVATION	CONTACT@DEC.NY.GOV
O'MELVENY & MYERS LLP	EJONES@OMM.COM
O'MELVENY & MYERS LLP	DCANTOR@OMM.COM; SINDELICATO@OMM.COM; GSVIRSKY@OMM.COM
PACHULSKI STANG ZIEHL & JONES LLP	SGOLDEN@PSZJLAW.COM;RFEINSTEIN@PSZJLAW.COM
PACHULSKI STANG ZIEHL & JONES LLP	JPOMERANTZ@PSZJLAW.COM;MLITVAK@PSZJLAW.COM
PACIFIC PETROLEUM CALIFORNIA, INC.	JOHN@PPCINC.BIZ
PG&E	PGE BANKRUPTCY@PGE.COM; MXTN@PGE.COM;MARCELLUS.TERRY@PGE.COM
QUINN EMANUEL URQUHART & SULLIVAN, LLP	PETERCALAMARI@QUINNEMANUEL.COM
QUINN EMANUEL URQUHART & SULLIVAN, LLP	DEVINVANDERHAHN@QUINNEMANUEL.COM
QUINN EMANUEL URQUHART & SULLIVAN, LLP	RAZMIGIZAKELIAN@QUINNEMANUEL.COM
ROCHELLE MCCULLOUGH, LLP	KDM@ROMCLAW.COM; STHOMAS@ROMCLAW.COM
SANTA BARBARA COUNTY P&D	IJZORO@CO.SANTA-BARBARA.CA.US
SANTA BARBARA COUNTY TREASURER-TAX COLLECTOR	SBTAXES@CO.SANTA-BARBARA.CA.US
SANTA BARBARA COUNTY TREASURER-TAX COLLECTOR	VMCISAA@CO.SANTA-BARBARA.CA.US
SHERRILL A. SCHOEPE	S.WETZLER@MUSICKPEELER.COM
SNOW SPENCE GREEN LLP	ROSS@SNOWSPENCELAW.COM; CAROLYN CAROLLO@SNOWSPENCELAW.COM
SPENCER FANE LLP	ERICVANHORN@SPENCERFANE.COM
STATE OF COLORADO ATTORNEY GENERAL	ATTORNEY.GENERAL@COAG.GOV
THE LAW OFFICE OF SUSAN M. WHALEN	SUSAN@WHALENATTORNEY.COM
VICTORY OIL	SMALLBUSINESSTEAM@WOLTERSKLUWER.COM
WEIL, GOTSHAL & MANGES LLP	RACHAEL.FOUST@WEIL.COM
WELTMAN & MOSKOWITZ, LLP	REW@WELTMOSK.COM; MLM@WELTMOSK.COM; AW@WELTMOSK.COM
WEST COAST WELDING & CONSTR. I	MBARBAY@WESTCOASTWELDING.NET
WILLIAM W. JENNY JR.	CARAMEL@HOTMAIL.COM

3. SERVED VIA U.S. FIRST CLASS MAIL

ANN JENNY SCHUPP C/O M H WHITTIER CORP. 1600 HUNTINGTON DRIVE SOUTH PASADENA, CA 91030	BRUCE S. GELBER DEPUTY ASST ATTORNEY GENERAL ENVIRONMENT & NATURAL RESOURCES DIVISION 950 PENNSYLVANIA AVE WASHINGTON, DC 20530	CARL DORÉ II DORÉ ROTHBERG MCKAY 17171 PARK ROW, SUITE 160 HOUSTON, TX 77084
CALIFORNIA FRANCHISE TAX BOARD PO BOX 942857 SACRAMENTO, CA 94257-0500	CALIFORNIA OSHA 1515 CLAY STREET, SUITE 1901 OAKLAND, CA 94612	CALIFORNIA DEPT. OF TOXIC SUBSTANCE CONTROL (BERKLEY REGIONAL OFFICE) 700 HEINZ AVENUE SUITE 200 BERKELEY, CA 94710-2721

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CHARLES C. ALBRIGHT TRUSTEE 729 WEST 16TH STREET #B8 COSTA MESA, CA 92627	DIANE T. WALKER 748 OCEANVILLE ROAD STONINGTON, ME 04681-9714	CALIFORNIA STATE CONTROLLER BETTY T. YEE TAX ADMINISTRATION SECTION PO BOX 942850 SACRAMENTO, CA 94250-5880
HVI CAT CANYON, INC. P.O. BOX 5489 SANTA MARIA, CA 93456	INTERNAL REVENUE SERVICE CENTRALIZED INSOLVENCY OPERATIONS PO BOX 7346 PHILADELPHIA, PA 19101-7346	FIRST AMERICAN TITLE INS. COMPANY TRUSTEE FOR UBS AG LONDON BRANCH 4380 LA JOLLA VILLAGE DRIVE, STE 110 SAN DIEGO, CA 92122
J. P. MORGAN-CHASE MICHAEL KERNEY 450 WEST 33RD STREET, 15TH FLOOR REF: 030057 NASSAU ASSOC-SABA NEW YORK, NY 10041	NORTHERN CALIFORNIA COLLECTION SERVICE, INC. 700 LEISURE LANE SACRAMENTO, CA 95815	INTERNAL REVENUE SERVICE (SMALL BUSINESS/SELF-EMPLOYMENT DIV) 5000 ELLIN ROAD LANHAM, MD 20706
STATE OF NEW YORK ATTORNEY GENERAL ATTN: LETIA A. JAMES DEPT. OF LAW THE CAPITOL, 2ND FL ALBANY, NY 12224	STONER FAMILY TRUST JAMES G. SANFORD TRUSTEE 100 WEST LIBERTY STREET. SUITE 900 RENO, NV 89501	SANTA BARBARA COUNTY -APCD AERON ARLIN GENET 260 NORTH SAN ANTONIO RD SANTA BARBARA, CA 93110
UBS AG, LONDON BRANCH JULIAN GOULD 600 WASHINGTON BLVD. STAMFORD, CT 06901	U.S. ATTORNEY'S OFFICE – SDNY ATTN: ANTHONY SUN, ASST. U.S. ATTY TAX & BANKRUPTCY UNIT 86 CHAMBERS ST., 3RD FLOOR NEW YORK, NY 10007	U.S. DEPARTMENT OF TRANSPORTATION 1200 NEW JERSEY AVE, SE WASHINGTON, DC 20590
WYATT SLOAN-TRIBE, ESQ. OFFICE OF THE ATTORNEY GENERAL 300 S. SPRING STREET, SUITE 1702 LOS ANGELES, CA 90013	OFFICE OF THE U.S. TRUSTEE BRIAN FITTIPALDI 1415 STATE STREET, SUITE 148 SANTA BARBARA, CA 93101	W. J. KENNY CORP. C/O ALLFIRST BANKCORP TRUST C/O M&T BANK ONE M&T PLAZA BUFFALO, NY 14203

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